

### III. REMARKS

1. Claims 1-22 remain in the application. Claims 1, 11, 21, and 22 have been amended.

2. Applicants respectfully submit that claims 1-22 are not anticipated by Bloebaum et al. (US 6,433,735, "Bloebaum").

Bloebaum fails to disclose or suggest using the one or more reference points to predict a pseudorange between the wireless communication device and a satellite of a positioning system, as recited by claims 1, 11, and 21.

Pseudoranges are discussed in the present specification, for example, on page 4, lines 9-17, on page 6, line 16 through page 7, line 17, including Equation 1, and page 24, lines 8-25, including Equation 6 (chip, bit and code phase).

Equation 6 on page 24 expresses that the pseudorange measurement is a function of the GPS time and the estimated location of the wireless communication device of the user. Equation 1 on page 6 expresses that the GPS time is the function of the measurements of the time data (time of week, TOW) contained in the last received subframe, the time in seconds corresponding to the number of C/A epochs received after the beginning of the last received subframe, and the code phase of whole chips received after the change of the last epoch. This also means that the pseudorange measurement in Equation 6 is a function of at least some the components of Equation 1.

The pseudoranges can be used to evaluate which reference point is located in the vicinity of the wireless communication device, and further, to evaluate the location of the wireless

communication device. These features are disclosed in the present specification, for example, on pages 24 to 26 with reference to Equations 6-12.

Bloebaum discloses a mobile terminal, system and method for determining the geographic location of the mobile terminal. The mobile terminal gathers identity information from the serving base station i.e. cell-ID, and examines a data base to find position data relating to the cell-ID. The position data related to the cell-ID may then be provided to a positioning receiver in the terminal. If no position data is found for the current cell-ID, the positioning receiver may request assistance information from other data sources or may perform the positioning without assistance data. When the positioning is performed, the position data can be stored into the database as position data relating to the cell-ID.

However, there is no disclosure in Bloebaum related to using the one or more reference points to predict a pseudorange between the wireless communication device and a satellite of a positioning system.


At least for these reasons, Applicants respectfully submit that independent claims 1, 11, and 21, and dependent claims 2-10, 12-20, and 22 are not anticipated by Bloebaum.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

A check in the amount of \$ 120.00 is enclosed for a one month extension of time.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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22 March 2005  
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#### CERTIFICATE OF MAILING

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